

National Association of Tower Erectors

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NATE Comments to Federal Communications Commission

Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment

WT Docket No. 17-79

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

We are writing on behalf of the National Association of Tower Erectors (NATE), a non-profit trade organization in the wireless and broadcast infrastructure industries. Our membership consists of over 770 companies that construct, service, and maintain hundreds of thousands of communications towers throughout the United States and nine other countries.

NATE strongly supports the plan announced by the Federal Communications Commission (FCC) on December 14, 2017 “to exclude from routine historic preservation review the collocation of wireless communications equipment on certain towers known as Twilight Towers.” The proposed plan would make existing infrastructure available for additional wireless deployments.

NATE is a relentless advocate for streamlining the process of deployment as it relates to wireless infrastructure. For too long, the regulatory status of twilight towers has placed the industry in limbo and an affirmative vote by FCC Commissioners to exclude collocations on these structures from routine historic preservation reviews is common sense policy.

We are at a critical juncture in the deployment – and expansion – of wireless services around the country. At a time of growing urgency for expanding broadband and helping to advance emerging communications programs and technologies, including FirstNet and the move to 5G, it is essential that decision makers identify ways to help meet this surging demand while promoting a productive and competitive future.

Your Partner in Safety, Standards and Education.

New towers can and will be built, but siting and planning, coupled with the requisite permitting processes, are time-consuming. An expedited way to facilitate tower work and the resulting benefits would be to expand collocation on existing towers, including, of course, those built between March 16, 2001 and March 7, 2005 that have not been eligible for collocations in the same way as towers that have documented Section 106 historic preservation review and clearance or towers that were exempted due to being built prior to the pre 2001 standard.

Permitting greater collocation would also help address another important issue: workforce shortages in the communications tower industry. There are not, at present, enough qualified workers to perform all the tower work we will be required to complete for FirstNet, 5G, and the mandates of the broadcast repack. Collocations on existing structures will be less labor-intensive than constructing new towers, thereby enabling us to utilize our tower technicians more efficiently. This is complementary to NATE's great interest in utilizing emerging technologies such as unmanned aerial systems for tower inspections, where we can deploy drones and free up technicians for other purposes while facilitating the maintenance or modification of existing towers.

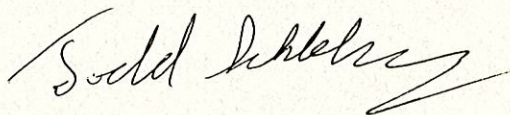
As we indicated when the FCC issued its proposed plan and solicitation of comments in December, NATE commends the agency for its goal of resolving the Twilight Towers "black hole" and opening up "thousands of more communication towers for NATE member companies to deploy wireless equipment."

NATE concurs completely with the FCC's stance that "collocations on Twilight Towers recognizes that collocations on existing towers have less potential to affect the environment and historic and cultural sites than constructing new towers. In addition, making these towers readily available for collocation will facilitate next-generation wireless services."

It is our further understanding that, as stated by the Wireless Infrastructure Association, "No formal complaints were filed by a Tribe or a Tribal Historic Preservation Office claiming a tower has had an adverse effect on their cultural preservation efforts. In fact, opening up Twilight Towers will actually reduce the number of new towers and therefore reduce the amount of ground disturbance that comes with new construction."

Accordingly, NATE formally submits these comments in support of the FCC's proposal of December 14, 2017.

Respectfully submitted,



Todd Schlekeway
Executive Director



Jim Goldwater
Director of Legislative & Regulatory Affairs